

TARGET SOURCING SERVICES



September 5, 2007

The Honorable Bobby L. Rush
United States House of Representatives
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Cliff Stearns
United States House of Representatives
2125 Rayburn House Office Building
Washington, D.C. 20515

Dear Representative Rush and Representative Stearns:

We received your letter of August 22, 2007 requesting information relating to children's products, imported to the United States from China, that contain lead exceeding lawful safety standards.

Target's responses to your questions are set out below:

- 1. In addition to the approximately 5,000 Anima-Bamboo Collection Games recalled by the CPSC in May, please provide detailed information on any toys or other products imported by your company with lead paint or lead content that exceeds lawful safety standards.*

Target has recalled the following products:

Kool Toyz Playset

190,500 units recalled by Target in November 2006.

Bamboo Anima Game

5,000 units recalled by Target in April 2007.

David Kirk Happy Giddy Children's Garden Trowel

No units in Target stores at the time of the recall August 2007.

Sunny Patch Safari Children's Chair

1,854 units recalled by Target on August 30, 2007.

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2. *Please provide information detailing the level of lead in the recalled toys and products, if available.*

Kool Toyz Playset

The Kool Toyz Play Sets consisted of several play sets containing action figures, dinosaurs, small dolls, doll playground and doll house pieces, trucks, cars, boats and planes. The toys were made in China. The paint used on some of the pieces contained lead as follows:

Tiny Playground/Dream House Play Sets - on some samples, the paint on the items included in the play set contained lead in the amount of approximately 1900 ppm.

Discovery Dinosaur Habitat - on some samples, the paint on the items included in the play set contained lead in the amount of approximately 1800 ppm.

Air, Land and Sea Defense Play Set - on some samples, the paint on the items included in the play set contained lead in the amount of approximately 960-9200 ppm.

Tank/Helicopter Action Figure Play Sets - on some samples, the paint on the items included in the play set contained lead in the amount of approximately 1500-6100 ppm.

Truck Carry Case - on some samples, the paint on the items included in the Carry Case contained lead in the amount of approximately 7200 ppm.

Air, Land and Sea Defense Plat Set - on some samples, the paint on the items included in the play set contained lead in the amount of approximately 960-9200 ppm.

Bamboo Anima Game

The Anima Bamboo game consisted of 38 bamboo pads, four ghost figures and one dice. The game pieces were painted various colors. The paint used on some of the pieces contained lead in the amount of approximately 720-1850 ppm.

David Kirk Happy Giddy Children's Garden Trowel

The David Kirk Garden Trowel is a children's product. On some samples, the paint on the handle of the trowel contained lead in the amount of approximately 6460-7600 ppm.

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Sunny Patch Safari Children's Chair

The Sunny Patch Safari Chair is a children's product. On some samples, the paint on the frame of the chair contained lead in the amount of approximately 21,000 ppm.

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4. *Are there provisions in your agreements with the Chinese or other manufacturers banning the use of lead and lead paint or limiting its use to lawful safety standards in the manufacture of the products your company imported?*

Yes, our vendor contracts contain the following language:

Compliance. Vendor warrants that the Goods, and the manufacture, sale, safety and transportation of the Goods, and all representations, warranties and advertising made by Vendor, or authorized by Vendor to be made, in connection with the Goods, shall be in accordance with, comply with, and where required, be registered under, all applicable laws, rules, regulations, standards, codes, orders, directives, judicial and administrative decisions, and ordinances, whether now in force or hereinafter enacted, of the United States, any state or other subdivision thereof, and any agency or entity of the foregoing, ("Laws"), including, without limitation: the Tariff Act of 1930; the Fair Packaging and Labeling Act; the Federal Food, Drug and Cosmetic Act; the Federal Trade Commission Act; the Magnuson-Moss Warranty Act – Federal Trade Commission Improvement Act; the Consumer Product Safety Act; the Flammable Fabrics Act of 1953; the Federal Hazardous Substances Act; the Fair Labor Standards Act of 1938; the Wool Products Labeling Act of 1939; the Textile Fiber Products Identification Act and the Fur Products Labeling Act; the United States Poison Prevention Packaging Act of 1970; the Child Protection Safety Act of 1969; the California Safe Drinking Water and Toxic Enforcement Act of 1986 (Prop 65); International Trade in Endangered Species of Wild Fauna and Flora, as listed in the United States Endangered Species Act of 1973; the United States Leachable Lead and Cadmium standards and all other applicable Federal Food and Drug Administration Standards; and such Laws relating to environmental and transportation matters or those requiring any form of notice or warning in connection with the sale, shipment, storage or marketing of the Goods. Vendor further warrants that all processes used or engaged in with respect to processing manufacturing, packaging, labeling, storing and shipping the Goods comply with all Laws, including, without limitation and to the extent applicable, those issued by the United States Department of Agriculture.

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5. *What steps does your company take to test and inspect imported toys or other children's products before they are sent to retail outlets in the United States to ensure compliance with lead level safety standards?*

All products sold under Target labels are required to be tested by a Target approved third party laboratory. Amongst other standards, such testing is designed to ensure that our products meet all U.S. safety (including, as appropriate, lead content) and labeling regulations.

Further, Target recently expanded its testing requirements with respect to toys. Toys sold under a Target label must undergo frequent testing throughout the production life cycle. One goal of our enhanced testing is to identify potential safety issues before a product leaves the factory.

6. *How and when did your company discover the lead paint on the imported items that lead to the recall announcement by the CPSC on May 2, 2007? When did you first contact the CPSC about the Anima-Bamboo Collection games?*

Kool Toyz Playset

Target first became aware of this issue through a guest complaint (unrelated to lead). As a result, Target pulled all items from this vendor and conducted additional testing in September 2006 which revealed excessive lead content. Target contacted the CPSC on September 14, 2006

Bamboo Anima Game

Target discovered this product had excessive lead content on April 2, 2006 when it received a test report from Bureau Veritas. The test was undertaken as the result of a rigorous testing protocol that Target maintains for products it sells under its own label. Target contacted the CPSC on April 2, 2006.

Happy Giddy Children's Garden Trowel

The Consumer Product Safety Commission conducted an independent investigation of the Happy Giddy garden trowel. The CPSC notified Target that this product contained excessive lead content on August 10, 2007.

Sunny Patch Safari Children's Chair

Target found this product to contain excessive lead content pursuant to an internal audit. Target contacted the CPSC on August 30, 2007.

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7. *Please provide details of the recall action undertaken by your company, including steps to inform retailers and consumers of the recall because of the lead hazard posed by the Anima-Bamboo Collection Games. Did you provide information in a language other than English? Did you take any specific steps to provide information to your retail partners located in underserved communities?*

Kool Toyz Playset & Bamboo Anima Game

Target participated proactively and voluntarily in the Consumer Product Safety Commission's Fast Track Product Recall Program with respect to the above referenced products. As part of the corrective action plan developed with the CPSC, Target collaborated with Office of Compliance Staff to draft press releases and in-store signage.

David Kirk Happy Giddy Children's Garden Trowel & Sunny Patch Safari Children's Chair

In both instances Target voluntarily agreed to a Recall and is currently in the process of developing Recall Corrective Action Plans with the Consumer Product Safety Commission.

Target does not currently post Recall signs in any language other than English.

8. *Please provide details on consumer response to the recall since the recall announcement, including how many games have been returned for a full refund.*

To date, Target has received the following:

Bamboo Anima Game

| | |
|--------------------------|----|
| Guest Returns | 0 |
| Guest contacts/inquiries | 14 |

Kool Toyz Playset

| | |
|--------------------------|-----|
| Guest Returns | 766 |
| Guest contacts/inquiries | 297 |

Happy Giddy Children's Garden Trowel

| | |
|--------------------------|----------------------------|
| Guest Returns | Recall not announced – N/A |
| Guest contacts/inquiries | Recall not announced – N/A |

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Sunny Patch Safari Children's Chair

Guest Returns

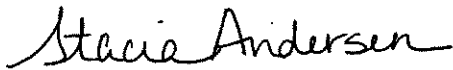
Recall not announced – N/A

Guest contacts/inquiries

Recall not announced – N/A

In conclusion, we have proactively enhanced our Target labeled product testing requirements by requiring multi-stage audits throughout the production life cycle. It is our goal to ensure that products that do not meet CPSC and Target standards never find their way to our shelves. We believe effectively addressing these issues will require close collaboration and coordination with government regulators, retailers and manufacturers. It has always been our practice to operate in this manner.

Sincerely,



Stacia Andersen
President Target Sourcing Services

SA/cg